



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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March 30, 2009

Engineering Field Activity, Midwest
Attn: Mr. Howard Hickey
Building 1A, Code 931
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: Draft Proposed Plan for Site 1 – Golf
Course Landfill and Site 4 – Fire Fighting
Training Unit, Naval Station Great Lakes
Great Lakes, Illinois

0971255048 – Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the submitted *Draft Proposed Plan for Site 1 – Golf Course Landfill and Site 4 – Fire Fighting Training Unit, Naval Station Great Lakes*. It was submitted on behalf of the Naval Facilities Engineering Command (Navy). It was dated March 2009 and was received at the Agency on March 19, 2009. The Proposed Plan is being presented to satisfy the statutory and regulatory requirements for public participation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and to seek public input on the proposed cleanup alternative, a presumptive remedy of a landfill cap plus additional controls and monitoring. The Agency has reviewed the submittal and is providing the following comments:

- 1) **About This Document** – Here and throughout the submittal, the actual dates for the public comment period will need to be provided once they have been determined.
- 2) **Site Description** – The estimated quantities of material to be addressed by the proposed remedy needs to be provided here.
- 3) **Summary of Site Risks** – This section needs to provide a more detailed description of the potentially exposed populations in the current and future risk scenarios (e.g. site workers, future residents living on the site, golfers, etc...).
- 4) **Why is Remedial Action Needed?** – The landfill closure requirements should also be listed here.
- 5) **Remedial Action Objectives** – When discussing the Applicable or Relevant and Appropriate Requirements (ARARs), the landfill closure requirements should be included as a separate bullet item.

- 6) **A Closer Look at the Proposed Remedial Action** - It should state here under Component 2 that a Land Use Control Implementation Plan (LUCIP) for this site will be appended to the Land Use Control Memorandum of Agreement (LUCMOA) between the Navy and Illinois EPA to ensure the restrictions will be applied and enforced until they are no longer required.
- 7) **General Comment** - The Proposed Plan mentions that land use will be restricted to non-residential use. However, it does not discuss what the anticipated future land use will be and whether it will be compatible with the proposed alternative. It is assumed that the site will remain a golf course, but the plan makes no mention of the golf course at all, other than to state that the site is currently within the current limits of the course. Suggest the plan be revised to include such discussion.
- 8) **General Comment** - The plan needs a concluding summary statement by the Navy similar to:

"Based on information currently available, the lead agency believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent possible; and 5) satisfy the preference for treatment as a principal element."

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or by electronic mail at Brian.Conrath@illinois.gov.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

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cc: Bob Davis, Tetra Tech NUS, Inc.

Owen Thompson, USEPA (SR-6J)